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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN  
BROADBENT; GINA ROHBOCK; NOLAN  
BARLOW; JASON BLACK; MAY MUSSER;  
HOLLY BISTLINE; LAWRENCE BARLOW;  
STEVEN DOCKSTADER; MARVIN COOKE;  
HELEN BARLOW; VERGEL BARLOW;  
CAROLE JESSOP; BRIELL LIBERTAE  
DECKER f/k/a, LYNETTE WARNER; AMY  
NIELSON; SARAH ALLRED; THOMAS  
JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION OF  
RUBY JESSOP**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, Ruby Jessop, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.
2. I am a Plaintiff in the above-captioned matter.
3. I make these statements based on my own knowledge and belief.
4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my trial testimony on September 27, 2022.
5. I was born and raised in the FLDS Church and was placed in an illegal spiritual marriage to Haven Barlow at age 14.
6. Based on my TVPRA claim against Warren Jeffs, I conservatively estimate that I incurred damages as summarized in this Damages Declaration.
7. To estimate the labor and services, I testified at trial that the total number of hours I worked for the benefit of Jeffs without being paid was at least three to five years, full time, eight hours a day. In addition to the labor and services I provided over that period, during the eleven exhausting years before I could escape, it was a full time job to support Jeffs. I wanted to keep my children and remain close to my mother so I worked hard and did everything I was told to do. Warren Jeffs got the benefit of my labor although I was faking loyalty to him.
8. Consistent with my trial testimony, however, based on an average of four years and 40 hour work weeks at minimum wage, I calculate my withheld wages at \$60,320. This estimate is based on my uncompensated work over a span of 208 weeks (4 years x 52 weeks x 40 hours a week) at the current minimum wage of \$7.25 an hour.
9. While I was under Jeffs' control, Jeffs knowingly forced me and threatened me with force both to myself and to my children to obtain my labor and services. Jeffs also knowingly used

physical restraint and the threat of physical restraint of me and my children by separating us and keeping us confined to obtain my labor and services. Jeffs did this knowingly using his fraudulent scheme, plan, and pattern to cause me to believe that if I did not provide labor and services for him, My children and I would suffer serious harm and physical restraint.

10. From the time I was married at 14, I had housing and some food provided by my husband and the FLDS Church, but as a minor I should have received the necessities of life, including basic housing, food and utilities until I was 18.

11. The value of the average standard of living that I experienced after turning 18 should be fully setoff against the higher wages that I should have been paid for my work, especially considering that I am only claiming a rate of \$7.25 an hour to calculate my forced donations.

12. I estimate the value of the necessities I received while in the FLDS at \$300 a month over the four years for which I claim withheld wages ( $\$300 \times 48$  months) for a total of \$14,400, which total amount may, in the Court's discretion, be deducted from my economic damages.

13. As a result of the mental health and emotional injuries I suffered trying to be obedient to Jeffs, being married at 14, being trapped in the community, raped over a period of 11 years and having lost my mother, I have required medical care.

14. Over the past 10 years, I estimate that I have seen mental health professionals for therapy at least 75 times and that they would have charged an average of \$110 per visit. Therefore, I would estimate that the medical bills for my past treatment to be in excess of \$8,250.

15. Accordingly, my economic damages after deductions for the necessities provided to me ( $\$60,320 - \$14,400 + \$8,250$ ) amount to \$54,170.

16. In terms of general or non-economic damages, I ask for general damages in the amount of \$3,000,000.

17. Therefore, I estimate that my total economic and non-economic damages are at least  $(\$54,170 + \$3,000,000)$  \$3,054,170.

18. Finally, I request an award of punitive damages in the amount of three times my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.

  
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Ruby Jessop